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13 UNITED STATES DISTRICT COURT

14 NORTHERN MARIANA ISLANDS

15 UNITED STATES OF AMERICA,) Criminal Case No. 05-00008
16 Plaintiff,)
17 v.) GOVERNMENT'S MOTION FOR
18 LIU, YA JUN,) SUBSTANTIAL ASSISTANCE
19 a/k/a, "CAndace,") DEPARTURE UNDER U.S.S.G. § 5K1.1
20 Defendant.) AND 18 U.S.C. § 3553(e)

21 COMES NOW the plaintiff, UNITED STATES OF AMERICA, by and through its counsel,
22 Leonardo M. Rapadas, United States Attorney, and Timothy E. Moran, Assistant United States
23 Attorney, and hereby moves the Court, pursuant to United States Sentencing Guidelines § 5K1.1 and 18
24 U.S.C. § 3553(e), to depart from the Sentencing Guidelines and the statutory mandatory minimum
25 consecutive sentence, based on the defendant's substantial assistance to the Government. The
Government also moves for a one-level reduction under U.S.S.G. § 3E1.1(b). The Government
recommends that the Court depart downward to advisory Guidelines **level 15**.

26 The Government intends to make its specific recommendation at the sentencing hearing.

27 LEONARDO M. RAPADAS
28 United States Attorney
29 Districts of Guam and the NMI

30 Date: September 7, 2006

31 By:

32 /s/
33 TIMOTHY E. MORAN
34 Assistant United States Attorney